

# Exhibit J



Vishal Agraharkar <[vishal@nsbcivilrights.com](mailto:vishal@nsbcivilrights.com)>

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## Allen v. City of St. Louis - Conflicts Motion

1 message

**Farhang Heydari** <[farhang@nsbcivilrights.com](mailto:farhang@nsbcivilrights.com)>

Wed, Jun 22, 2016 at 1:14 PM

To: "Luepke, Bud" <[bud.luepke@ago.mo.gov](mailto:bud.luepke@ago.mo.gov)>, "Isaacson, Robert" <[robert.isaacson@ago.mo.gov](mailto:robert.isaacson@ago.mo.gov)>, McDonnellIT@stlouis-mo.gov, wheatona@stlouis-mo.gov

Cc: "Weiss, Charles" <[caweiss@bryancave.com](mailto:caweiss@bryancave.com)>, "Gado, Ameer" <[aagado@bryancave.com](mailto:aagado@bryancave.com)>, Nick Brustein <[nick@nsbcivilrights.com](mailto:nick@nsbcivilrights.com)>, Emma Freudenberger <[emma@nsbcivilrights.com](mailto:emma@nsbcivilrights.com)>, Vishal Agraharkar <[vishal@nsbcivilrights.com](mailto:vishal@nsbcivilrights.com)>

Counselors,

We have reviewed the individual Defendants' and the State's response to Plaintiffs' Motion to Disqualify Counsel.

If you are taking the position that either the State or the City will indemnify the individual officer defendants in this case for any and all damages, fees, and expenses, whether determined by settlement or judgment, without any caps and regardless of the total amount, then we propose entering into an agreement between all parties making this position clear.

If you are indeed willing to sign such an agreement, then we believe that the conflict Plaintiffs raised in the Motion to Disqualify is waiveable.

Please advise us this week whether you are willing to sign such an agreement.

Thank you,  
Farhang

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Farhang Heydari

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